IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM LOCKWOOD	*	
Plaintiff	*	
v.	*	Civil Action No. WMN-02-CV-2068
PACIFIC USA, LTD., et al.	*	
Defendants	*	

* * * * * * * * * *

AFFIDAVIT OF WILLIAM LOCKWOOD

I, William Lockwood, declare under penalty of perjury that the following is true and correct:

1.   I am over the age of eighteen and am competent to testify to the following matters upon personal knowledge.

2.   Since mid-June of 2003, I have been employed as a commissioned salesman by Fox Chevrolet at its Padonia Road dealership, upon completion of my training.

3.   My earnings for June and July of 2003, which include two weeks of training at $400.00 per week, are $4,997.00.

4.   At the conference on August 19, 2003, I estimated a day's earnings at $140.00, commission earnings of approximately $700.00 per week.

I DO SOLEMNLY DECLARE AND AFFIRM under the penalties of perjury that the contents of the aforegoing Affidavit are true and correct.

WILLIAM LOCKWOOD

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM LOCKWOOD   *

      Plaintiff   *

v.   *   Civil Action No. WMN-02-CV-2068

PACIFIC USA, LTD., et al.   *

      Defendants   *

*   *   *   *   *   *   *   *   *   *

AFFIDAVIT OF DIANNE SAUNDERS

I, Dianne Saunders, declare under penalty of perjury that the following is true and correct:
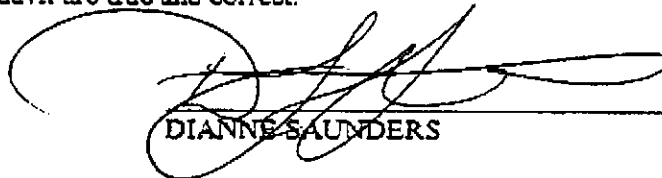
1.   I am over the age of eighteen and am competent to testify to the following matters set forth herein which are based upon my personal knowledge.

2.   I am currently employed as the finance director for Len Stoler, Inc. My office is located at the Len Stoler Dealership in Reisterstown, Maryland.

3.   As of August 19, 2003, my earnings-to-date from Len Stoler, Inc. were $118,424.00 for the first 33 weeks of the year, or $3,588.61 per week.

4.   At the conference on August 19, 2003, I estimated a day's earnings to be $700.00.

I DO SOLEMNLY DECLARE AND AFFIRM under the penalties of perjury that the contents of the aforegoing Affidavit are true and correct.

DIANNE SAUNDERS